

*Aidala, Bertuna & Kamins, P.C.*

ARTHUR L. AIDALA\*  
MARIANNE E. BERTUNA\*  
HON. BARRY KAMINS (RET.)  
HON. JOHN M. LEVENTHAL (RET.)  
HON. DAVID L. LEWIS (RET.)  
JOHN S. ESPOSITO\*  
MICHAEL T. JACCARINO  
IMRAN H. ANSARI  
DIANA FABI SAMSON\*\*  
DAVID M. SCHWARTZ+  
ANDREA M. ARRIGO\*  
MICHAEL F. DIBENEDETTO\*  
LINO J. DE MASI  
ROSARIO BONA  
GIOVANNI ORLANDO CONTI

\*ALSO ADMITTED IN NEW JERSEY  
\*\*ALSO ADMITTED IN CONNECTICUT  
+ALSO ADMITTED IN D.C.

546 FIFTH AVENUE  
NEW YORK, NY 10036  
TELEPHONE: (212) 486-0011  
FACSIMILE: (917) 261-4832  
WWW.AIDALALAW.COM

8118 - 13TH AVENUE  
BROOKLYN, NEW YORK  
11228 TEL: (718) 238-9898  
FAX: (718) 921-3292

OF COUNSEL  
JOSEPH A. BARATTA  
ANTOINETTE LANTERI  
WILLIAM R. SANTO  
PETER S. THOMAS  
LAWRENCE SPASOJEVICH  
SIGURD SORENSON

SENIOR COUNSEL  
LOUIS R. AIDALA  
JOSEPH P. BARATTA

October 4, 2024

Hon. Eric R. Komitee  
United States District Judge  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, NY 11201

Re: *Edmondson et al v. Raniere et al – 1:20-cv-00485-EK-CLP*  
Re: *Order on Motion to Dismiss*

Dear Judge Komitee:

We respectfully submit this letter on behalf of our client Clare Bronfman (“Ms. Bronfman”). On September 27, 2024, the Court entered its Memorandum & Order, granting in part, and denying in part, Ms. Bronfman’s Motion to Dismiss Plaintiffs’ Complaint [Doc. No. 240]. We now write to the Court to seek clarification as to when Ms. Bronfman’s responsive pleading is due.

Pursuant to FRCP Rule 12(a)(4)(A) Ms. Bronfman’s time to file her responsive pleading to the counts remaining in the Complaint is October 11, 2024. However, in its Order, the Court directed Plaintiffs to file a revised Schedule A within 60 days of the Court’s Order: November 26, 2024. The revised Schedule A may be determinative as to whether Plaintiffs can sustain the requirements of a facially sufficient pleading as to their RICO and RICO Conspiracy counts against Ms. Bronfman.

Ms. Bronfman respectfully seeks clarification from the Court as to whether the time to file her responsive pleading is already tolling upon the entry of the Court’s Memorandum & Order on September 27, 2024, or, if it will begin when Plaintiffs file their revised Schedule A. Should the tolling have already started, and the responsive pleading be due on October 11, 2024, then Ms. Bronfman respectfully requests additional time to file her responsive pleading, specifically, 14 days *after* the date that Plaintiffs must file their revised Schedule A: December 10, 2024.

This is Ms. Bronfman’s first request to extend the date to file a responsive pleading in this matter. The undersigned sent correspondence to Plaintiffs’ counsel on October 1, 2024, regarding

the request made herein, but has not yet received a response. We thank you for your consideration of this matter.

Sincerely,

/s/Imran H. Ansari  
IMRAN H. ANSARI